

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

CHANTAL KATHLEEN STANTON
1211 Wyoming Drive
Santa Rosa, CA 95405

Registered Nurse License No. 752916

Respondent

Case No. 2013-140

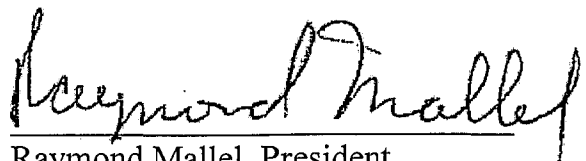
OAH No. 2012100144

DECISION AND ORDER

The attached Stipulated Surrender of License and Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on **December 24, 2012.**

IT IS SO ORDERED **December 24, 2012.**



Raymond Mallel, President
Board of Registered Nursing
Department of Consumer Affairs
State of California

1 KAMALA D. HARRIS
Attorney General of California
2 DIANN SOKOLOFF
Supervising Deputy Attorney General
3 KIM M. SETTLES
Deputy Attorney General
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7 *Attorneys for Complainant*

8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2013-140

13 **CHANTAL KATHLEEN STANTON**
1211 Wyoming Drive
Santa Rosa, CA 95405
14 Registered Nurse License No. 752916

OAH No. 2012100144

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

15 Respondent.

16 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this
17 proceeding that the following matters are true:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN (Complainant) is the Executive Officer of the Board of
20 Registered Nursing. She brought this action solely in her official capacity and is represented in
21 this matter by Kamala D. Harris, Attorney General of the State of California, by Kim M. Settles,
22 Deputy Attorney General.

23 2. Chantal Kathleen Stanton (Respondent) is representing herself in this proceeding and
24 has chosen not to exercise her right to be represented by counsel.

25 3. On or about June 26, 2009, the Board of Registered Nursing issued Registered Nurse
26 License No. 752916 to Chantal Kathleen Stanton (Respondent). The Registered Nurse License
27 was in full force and effect at all times relevant to the charges brought in Accusation No. 2013-
28 140 and will expire on January 31, 2013, unless renewed.

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1 Registered Nursing may communicate directly with the Board regarding this stipulation and
2 surrender, without notice to or participation by Respondent. By signing the stipulation,
3 Respondent understands and agrees that she may not withdraw her agreement or seek to rescind
4 the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt
5 this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be
6 of no force or effect, except for this paragraph, it shall be inadmissible in any legal action
7 between the parties, and the Board shall not be disqualified from further action by having
8 considered this matter.

9 11. The parties understand and agree that facsimile copies of this Stipulated Surrender of
10 License and Order, including facsimile signatures thereto, shall have the same force and effect as
11 the originals.

12 12. This Stipulated Surrender of License and Order is intended by the parties to be an
13 integrated writing representing the complete, final, and exclusive embodiment of their agreement.
14 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
15 negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order
16 may not be altered, amended, modified, supplemented, or otherwise changed except by a writing
17 executed by an authorized representative of each of the parties.

18 13. In consideration of the foregoing admissions and stipulations, the parties agree that
19 the Board may, without further notice or formal proceeding, issue and enter the following Order:

20 **ORDER**

21 IT IS HEREBY ORDERED that Registered Nurse License No. 752916, issued to
22 Respondent Chantal Kathleen Stanton, is surrendered and accepted by the Board of Registered
23 Nursing.

24 1. The surrender of Respondent's Registered Nurse License and the acceptance of the
25 surrendered license by the Board shall constitute the imposition of discipline against Respondent.
26 This stipulation constitutes a record of the discipline and shall become a part of Respondent's
27 license history with the Board of Registered Nursing.
28

1 2. Respondent shall lose all rights and privileges as a Registered Nurse in California as
2 of the effective date of the Board's Decision and Order.

3 3. Respondent shall cause to be delivered to the Board her pocket license and, if one was
4 issued, her wall certificate on or before the effective date of the Decision and Order.

5 4. If Respondent ever files an application for licensure or a petition for reinstatement in
6 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must
7 comply with all the laws, regulations and procedures for reinstatement of a revoked license in
8 effect at the time the petition is filed, and all of the charges and allegations contained in
9 Accusation No. 2013-140 shall be deemed to be true, correct and admitted by Respondent when
10 the Board determines whether to grant or deny the petition.

11 5. If and when Respondent's license is reinstated, she shall pay to the Board costs
12 associated with its investigation and enforcement pursuant to Business and Professions Code
13 section 125.3 in the amount of \$1,200.00. Respondent shall be permitted to pay these costs in a
14 payment plan approved by the Board. Nothing in this provision shall be construed to prohibit the
15 Board from reducing the amount of cost recovery upon reinstatement of the license.

16 6. If Respondent should ever apply or reapply for a new license or certification, or
17 petition for reinstatement of a license, by any other health care licensing agency in the State of
18 California, all of the charges and allegations contained in Accusation, No. 2013-140 shall be
19 deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of
20 Issues or any other proceeding seeking to deny or restrict licensure.

21 7. Respondent shall not apply for licensure or petition for reinstatement for two (2)
22 years from the effective date of the Board of Registered Nursing's Decision and Order.

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ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my Registered Nurse License. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Registered Nursing.

DATED: 10/15/12


CHANTAL KATHLEEN STANTON
Respondent

ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

Dated: 10/16/12

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
DIANN SOKOLOFF
Supervising Deputy Attorney General



KIM M. SETTLES
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 2013-140

1 KAMALA D. HARRIS
Attorney General of California
2 DIANN SOKOLOFF
Supervising Deputy Attorney General
3 KIM M. SETTLES
Deputy Attorney General
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8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. **2013-140**

13 **CHANTAL KATHLEEN STANTON**
19136 North Shore Drive
Hidden Valley Lake, CA 95467

ACCUSATION

14 **Registered Nurse License No. 752916**

15 **Respondent.**

16
17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
20 official capacity as the Executive Officer of the Board of Registered Nursing, Department of
21 Consumer Affairs.

22 2. On or about June 26, 2009, the Board of Registered Nursing issued Registered Nurse
23 License Number 752916 to Chantal Kathleen Stanton (Respondent). The Registered Nurse
24 License was in full force and effect at all times relevant to the charges brought in this Accusation
25 and will expire on January 31, 2013, unless renewed.

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1 himself or herself, any other person, or the public or to the extent that such use impairs his or her
2 ability to conduct with safety to the public the practice authorized by his or her license.

3 "(c) Be convicted of a criminal offense involving the prescription, consumption, or self
4 administration of any of the substances described in subdivisions (a) and (b) of this section, or the
5 possession of, or falsification of a record pertaining to, the substances described in subdivision (a)
6 of this section, in which event the record of the conviction is conclusive evidence thereof."

7 8. Section 490 of the Code provides, in pertinent part, that a board may suspend or
8 revoke a license on the ground that the licensee has been convicted of a crime substantially
9 related to the qualification.

10 9. California Code of Regulations, title 16, section 1444, states:

11 "A conviction or act shall be considered to be substantially related to the qualifications,
12 functions or duties of a registered nurse if to a substantial degree it evidences the present or
13 potential unfitness of a registered nurse to practice in a manner consistent with the public health,
14 safety, or welfare."

15 COST RECOVERY

16 10. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
17 administrative law judge to direct a licensee found to have committed a violation or violations of
18 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
19 enforcement of the case.

20 DRUGS

21 11. "Methamphetamine" is a highly addictive recreational drug. It is a Schedule II
22 controlled substance as designated by Health and Safety Code section 11055, subdivision (d)(2),
23 and a dangerous drug pursuant to Business and Professions Code section 4022.

24 12. "Heroin" is an opiate that is synthesized from morphine. It is a highly addictive
25 recreational drug. It is a Schedule I controlled substance as designated by Health and Safety
26 Code section 11054, subdivision (c), and a dangerous drug pursuant to Business and Professions
27 Code section 4022.

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1 FOURTH CAUSE FOR DISCIPLINE

2 (Unprofessional Conduct – Use of Drugs)

3 16. Respondent has subjected her license to disciplinary action under section 2761,
4 subdivision (a), on the grounds of unprofessional conduct as defined by section 2762, subdivision
5 (b), in that on or about November 21, 2011, Sonoma Sheriff's Deputy contacted Respondent and
6 observed two syringes, a sponge with burn marks, used baggies, and a single piece of "tar heroin"
7 in Respondent's vehicle. The Deputy also confiscated four syringes from Respondent's purse.
8 Respondent admitted to the Deputy that she had injected herself with Heroin an hour before she
9 was contacted by the officer. Respondent admitted to the Deputy that she had previously used
10 stimulants and had switched to Heroin.

11 PRAYER

12 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged
13 in this Accusation, and that following the hearing, the Board of Registered Nursing issue a
14 decision:

15 1. Revoking or suspending Registered Nurse License Number 752916, issued to Chantal
16 Kathleen Stanton;

17 2. Ordering Chantal Kathleen Stanton to pay the Board of Registered Nursing the
18 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
19 Professions Code section 125.3;

20 3. Taking such other and further action as deemed necessary and proper.

21 DATED: August 24, 2012

Louise R. Bailey
LOUISE R. BAILEY, M.Ed., RN
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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